

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KEENAN SANIATAN, *et al.*

Defendant.

Case No. 23-cr-10245-IT

JOINT FINAL STATUS REPORT

The United States and defendant Keenan Saniatan jointly submit the following final status report. Pursuant to Local Rule 116.5(c)(2), the parties jointly ask the Court to prepare a final status report, transfer this matter to the district court for further proceedings, and cancel the April 1, 2024, final status conference. The parties further state as follows:

I. Local Rule 116.5(c)(2)(A) – Status of Discovery

The government has produced automatic discovery as required by Fed. R. Crim. P. 16 and Local Rules 116.1(c) and 116.2, as well as discovery beyond that required by these rules. No additional discovery is expected. The government has requested reciprocal discovery under Fed. R. Crim. P. 16(b) and Local Rule 116.1(d).

II. Local Rule 116.5(c)(2)(B) – Discovery Requests and Motions

There are no outstanding discovery requests or motions for discovery.

III. Local Rule 116.5(c)(2)(C): Motions Under Fed. R. Crim. P. 12(b)

The defendant expects to file a motion to dismiss the indictment on or before April 1, 2024. The government will respond to the motion within the time allowed by Local Rule 7.1(b)(2), at which time the motion will be ready for resolution by the district court.

VI. Local Rule 116.5(c)(s)(D): Speedy Trial Act Calculation

The 70-day period specified in 18 U.S.C. § 3161(c)(1) commenced on September 15, 2023. The Court previously excluded all time between September 15, 2023, and April 1, 2024 (ECF Nos. 55, 75, 101, and 124). The parties jointly ask the Court to exclude the period from April 1, 2024, until the date of the pretrial conference before the district court pursuant to 18 U.S.C. § 3161(h)(7) because the ends of justice served by excluding the period of this continuance outweigh the best interest the public and the defendant in a speedy trial.

V. Local Rule 116.5(c)(2)(E): The Estimated Number of Trial Days

The government's case-in-chief is expected to last approximately five trial days.

Respectfully submitted,

KEENAN SANIATAN
Defendant,

JOSHUA S. LEVY
Acting United States Attorney,

By: /s/ Erin Opperman
Erin Opperman, Esq.
Counsel for Keenan Saniatan

By: /s/ Jason A. Casey
Jason A. Casey
Torey B. Cummings
Assistant U.S. Attorneys

Date: March 25, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by regular mail to the participants who do not receive electronic filing.

/s/ Jason A. Casey
Jason A. Casey
Assistant U.S. Attorney